

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA:

Furama Los Angeles, Inc.	:	
<u>Dragon Charm, LLC</u>	:	
Larry J. Austin	:	
and related entities	:	
c/o John E. Williams	:	
3213 Duke Street, Suite 601	:	
Alexandria, VA 22314	:	
	:	
Plaintiffs	:	
v.	:	Civil Action No. 1:15-cv-00049-TSE-TCB
Graham Taylor, Esq.,	:	
Dewey LeBoeuf Liquidating Trust,	:	
as successor to Dewey LeBoeuf, (as successor	:	
to LeBoeuf Lamb, together with all partners of said	:	
firm (and associates) (collectively "LeBoeuf");	:	
Proskauer Rose LLC; Deutsche Bank AG; as well as:	:	
the defendants John Does 1 through 10, said names	:	
being fictitious, but intended to refer to those firms	:	
and/or individuals providing malpractice coverage	:	
and/or support work for the advice and services of	:	
the prior-named Defendants herein ("Supporting	:	
Defendants"); Ira Akselrod, Esq. and Proskauer	:	
Rose LLC (the "Proskauer Defendants");	:	
R. J. Ruble, Esq., and Sidley Austin	:	
Brown & Wood LLC, ("Sidley Defendants")	:	
	:	
Defendants	:	
.....	:	

PLAINTIFFS' RESPONSE TO ORDER AND
MOTION FOR EXTENSION OF TIME

Plaintiffs have complied with the Court's recent Order to effect service of process, and move that the Court grant Plaintiffs additional time to provide the Court return documents from such service, and state as follows:

1. Plaintiffs have timely effected service of process on the relevant Defendants through the Office of Secretary of the Virginia Commonwealth ("SOC") pursuant to FRCP Rules 4(e)(1) and 4(h)(1)(A), as detailed in the attached Affidavit of Service by

Plaintiffs' Counsel.

2. As a precaution, Plaintiffs have also requested from each a waiver of service pursuant to FRCP Rule 4(d).

3. Securing the return documents to both processes could not have been completed in the time period since the Court ordered Plaintiffs to effect such service.

Accordingly, Plaintiff requests that the Court grant additional time (45 days) within which to receive and file with the Court the return documents from both service processes, being the SOC Certificates of Compliance from the service process through such Office, and the waivers pursuant to FRCP Rules 4(e)(1) and 4(h)(1)(A).

4. The certified USPS receipt for filing with the SOC today is attached. Also attached are Exhibits 1 through 7 which contain for each Defendant: Affidavit for Service of Process Through the Secretary of the Commonwealth, the Request for Waiver, and the Waiver of Service of Summons. These Exhibits omit the various multiple copies of certain of those documents, envelopes, and copies of the Complaint, as required by the rules governing both service processes and as included in the various filings by USPS.

Respectfully submitted,

/s/ John E. Williams

John E. Williams, Esq.
Counsel to Plaintiff
3213 Duke Street, Suite 601
Alexandria, Virginia 22314
VA Bar #14111
Tele: 703 838-2939
Fax: 703 548-6173
johndwardwilliams@earthlink.net

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2015, I mailed via USPS, postage-prepaid, a copy of the foregoing Response and Motion with all attachments and Exhibits to each Defendant as described in the attached Affidavit.

_____/s/ John E. Williams_____

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Brown & Wood LLC, ("Sidley Defendants")	:
	:
Defendants	:
.....	:

AFFIDAVIT OF SERVICE OF PROCESS BY PLAINTIFF'S COUNSEL

I, John E. Williams, Esq., Plaintiffs' Counsel herein, do declare under penalties of perjury as follows:

1. In compliance with the Court's Order and FRCP Rules 4(e)(1) and 4(h)(1)(A) I have cause service of process through the Office of the Secretary of the Commonwealth of Virginia on each of the following Defendants herein:

Mr. Graham Taylor

Ira Akselrod, Esq.

Mr. Raymond J. Ruble

Sidley Austin LLP

Proskauer Rose LLP

Deutsche Bank AG

Dewey LeBoeuf Liquidating Trust

2. I have also today requested each such Defendant to waive service under FRCP Rule 4(d).
3. Return documents from both processes will be filed with the Court as received.

Respectfully submitted,

/s/ John E. Williams

John E. Williams, Esq.
Counsel to Plaintiff
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Alexandria, Virginia 22314
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Brown & Wood LLC, ("Sidley Defendants")	:	
	:	
Defendants	:	
.....	:	

ORDER

On consideration of the Plaintiffs' Motion for Extension of Time, and any Defendants' Opposition thereto, it is hereby

ORDERED that Plaintiffs' Motion is granted; and it is

ORDERED that Plaintiff shall have an additional 45 days from the date of this Order to file the return documents from Plaintiffs' service or process or requests for waivers.

ENTERED this ____ day of July 2015.

The Honorable T. S. Ellis, III
Judge